

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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*Attorneys the Debtor/Debtor-in-Possession
Bay Three Limited, Inc.*

In Re:

BAY THREE LIMITED, INC.,

Debtor.

Case No.: 12-15866

Chapter 11

Judge: Michael B. Kaplan

**NOTICE OF MOTION PURSUANT TO SECTIONS 105(a) AND 363 OF THE
BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 6004 FOR AN ORDER
APPROVING BIDDING PROCEDURES AND APPROVING THE SALE OF LIQUOR
LICENSE FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES**

TO: ALL PARTIES ON THE ANNEXED SERVICE LIST

PLEASE TAKE NOTICE, that on Monday, March 18, 2013 at 10 o'clock in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for the debtor will move before the Honorable Michael B. Kaplan, U. S. Bankruptcy Judge, at the United States Bankruptcy Court, Courtroom 8, 402 East State Street, Trenton, New Jersey 08608 for an order approving bidding procedures and thereafter approving the sale of the Debtor's liquor license to Ichabon of Toms River, LLC, or to such other person who makes a higher and better offer. IN the event of competing offers, the License will be sold to the highest bidder at an auction to be held in court at the time and place aforesaid.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the Verified Application certification in support of said Motion.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 9013-1(f) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, the Debtor requests oral argument of this motion.

PLEASE TAKE FURTHER NOTICE that in the event that no objection of other responsive pleading is file to this Motion, the Motion shall be deemed uncontested on the return date and the relief sought herein may be granted in the Court's discretion.

A proposed form of Order also accompanies this Motion.

Broege, Neumann, Fischer & Shaver, LLC
Attorneys *the Debtor/Debtor-in-Possession*
Bay Three Limited, Inc.

By: /s/ Timothy P. Neumann
TIMOTHY P. NEUMANN

Dated: March 25, 2018

SERVICE LIST

Via email:

Jersey Central Power & Light Company
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